ERRP

Early Retiree Reinsurance Program

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ERRP Early Retirees

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Identifying ERRP Early Retirees

Identifying ERRP Early Retirees

- Generally, the term "early retiree" will apply to the early retiree (Subscriber) and his or her enrolled spouse, surviving spouse and/or dependent(s) (Member).

- To determine if an early retiree's costs are eligible for ERRP reimbursement, there are two primary considerations.

Identifying ERRP Early Retirees

These considerations are whether:

- 1) the individual that the Plan Sponsor is claiming actually is an early retiree, the determination of which is based on such things as age, plan participation, and employment status, (or is a spouse, surviving spouse or dependent of an early retiree) **and**

- 2) the early retiree or the early retiree's spouse, surviving spouse, or dependent(s) has accumulated $15,000 or more in eligible claims that have been paid by the employment-based plan and/or the early retiree or early retiree's spouse, surviving spouse or dependent(s).

Identifying ERRP Early Retirees

- The term "Subscriber" refers to the individual who must meet the requirements to be an "early retiree" and through whom the spouse, surviving spouse and/or dependent(s) receive their health care coverage.

- The term "Member" refers to the early retiree's spouse, surviving spouse, and/or dependent(s).

Identifying ERRP Early Retirees

- When determining if an individual is an early retiree, all of the following **must** be true for the Subscriber before the Subscriber's, and/or associated Member(s), claims can be considered for credit towards the cost threshold or reimbursed, as applicable.

- Subscriber must be:

  - Age 55 and older,

  - Enrolled for health benefits in the certified employment-based plan identified on the application,

  - Not eligible for coverage under Medicare (which the U.S. Department of Health & Human Services will verify upon receiving a Plan Sponsor's Early Retiree List), and

  - Not an active employee of the Plan Sponsor identified on the application (in accordance with the rules of the plan).

Identifying Early Retirees

- After the Plan Sponsor has identified its early retirees (Subscribers) based on the above-specified criteria, a second condition must be present for an individual to be included on the ERRP Early Retiree List.

- The individual (i.e. the Subscriber and/or Member) must have incurred $15,000 or more in plan and/or early retiree (or early retiree's spouse, surviving spouse, or dependent(s)) paid claim amounts for health benefits during the plan year, which are eligible for credit towards the ERRP cost threshold or ERRP reimbursement, as applicable.

Identifying Eligible Claims

Identifying Eligible Claims

- Accrual of eligible claims occurs on an individual basis. Therefore, a Subscriber's claims accrue for the Subscriber. A Member's claims accrue for the individual Member.

- In order for a claim for a specific medical item or service to count towards the $15,000 cost threshold or be reimbursed, it must meet **all** of the following conditions.

Identifying Eligible Claims

- The claim must be:
  - For a medical item or service that is covered by Medicare Parts A or B, or a drug that can be covered by a standard Part D plan;
  - Incurred within the plan year (For plan years that start before and end after June 1, 2010, claims incurred between the start of the plan year and May 31, 2010 can only be credited toward the $15,000 threshold, and only claims incurred on or after June 1, 2010 are eligible for reimbursement);
  - Actually paid by the participating employment-based plan and/or by the individual (For amounts paid by the individual, the Plan Sponsor must provide prima facie evidence that the individual paid the amount).

Formatting Early Retiree Data

Formatting Early Retiree Data

- The Early Retiree List is a collection of data about the individual(s) for whom a Plan Sponsor has or will request reimbursement.
- The Early Retiree List must be submitted to ERRP as part of the reimbursement request process.
- A Plan Sponsor must submit prior to each reimbursement request an electronic cumulative list of early retirees and their spouses, surviving spouses, and dependents for whom it is seeking, or has sought, ERRP reimbursement for the plan year.

Formatting Early Retiree Data

- For those individuals meeting the Early Retiree eligibility and claim threshold requirements, the ERRP Center requires the following information about the early retiree and early retiree's spouse, surviving spouse or dependent:

- Subscriber SSN
- Member Unique Person ID
- Member First, Middle Initial, Last Name
- Member Date of Birth
- Member Gender

- Member relationship to Early Retiree
- Member ID
- Member Group ID
- Member Unique Person ID Type
- Member Coverage Effective Date
- Member Coverage Termination Date
- Member Coverage Termination Reason

Formatting Early Retiree Data

- A Plan Sponsor will be required to submit each Early Retiree List using a format specified by HHS' ERRP Center.

- Refer to the ERRP Public Website Reference Materials Section for detailed Early Retiree List format requirements.

Completing Early Retiree List Setup

Completing Early Retiree Setup

Early Retiree List Setup is the process whereby a Plan Sponsor uses the ERRP Secure Website to identify:

- – 1) the source that will submit Early Retiree Lists for each plan year, and

- – 2) the method by which the Early Retiree Lists will be submitted and Early Retiree Response files received.

Completing Early Retiree Setup

- To perform Early Retiree List Setup in the ERRP Secure Website, a Plan Sponsor will also need to indicate the following:
  - If it would like an individual other than the Account Manager or Authorized Representative to complete Early Retiree List Setup, if applicable (Assign Designee)
  - Method of Early Retiree File List submission to HHS' ERRP Center and method of Receiving Retiree Response Files from HHS' ERRP Center
  - If it would like an individual other than the Account Manager or Authorized Representative to view/send or receive Early Retiree data (Assign Designee)

Completing Early Retiree Setup

- Using the ERRP Secure Website (SWS) the Plan Sponsor will select **one** method for submission and receipt of retiree information.

  – Submission via ERRP SWS- Response via ERRP SWS

  – Submission via Plan Sponsor's Mainframe to ERRP Data Center's Mainframe - Response via ERRP Data Center's Mainframe to Plan Sponsor's Mainframe

  – Submission via Plan Sponsor's Mainframe to ERRP Data Center's Mainframe - Response via ERRP Data Center's Mainframe to Plan Sponsor's Mainframe with a copy of all Early Retiree Response Files sent to the ERRP SWS

  – Submission via Vendor's Mainframe to ERRP Data Center's Mainframe - Response via ERRP Data Center's Mainframe to Vendor's Mainframe

  – Submission via Vendor's Mainframe to ERRP Data Center's Mainframe - Response via ERRP Data Center's Mainframe to Vendor's Mainframe with a copy of all Early Retiree Response Files sent to the ERRP SWS

Submitting Early Retiree List to HHS' ERRP Center

Submitting Early Retiree Lists

- Plan Sponsors are required to submit an Early Retiree List prior to submitting each reimbursement request. The Early Retiree List must be specific to the plan year for which reimbursement is requested.

- An Early Retiree List should **ONLY** include ERRP-eligible Subscribers and/or Members meeting the $15,000 cost threshold.

- Additionally, if the Subscriber does not meet the cost threshold, but a Member does, then the Subscriber record **must** also be submitted on the Early Retiree List in addition to the associated Member record.

Submitting Early Retiree Lists

- HHS' ERRP Center will accept an Early Retiree List in one of two ways:

  – Uploaded to the ERRP Secure Website (SWS), or

  – Transmitted via a mainframe connection to the ERRP Center mainframe.

Submitting Early Retiree Lists

- What a Plan Sponsor needs to know about <u>Mainframe submissions</u>:

  - If mainframe submission is preferred, it is necessary to call <u>HHS' ERRP Center</u> as soon as possible to begin the setup process.

  - HHS' ERRP Center will accept mainframe files from either a Plan Sponsor's Mainframe or a specified Vendor's.

Submitting Early Retiree Lists

- What a Plan Sponsor needs to know about <u>Mainframe submissions (cont'd)</u>:

  - If a Vendor is submitting on behalf of a Plan Sponsor, that Vendor must be assigned a Vendor ID by HHS' ERRP Center. If a Vendor has an RDS Vendor ID, they still need to contact the ERRP Center to establish an ERRP Vendor ID. *Contact the Vendor to confirm the ERRP Vendor ID before attempting Early Retiree File Setup.*

  - If a Plan Sponsor's entire mainframe Early Retiree List is rejected during the first level of edits (errors were found in the Header Record, Detail Record, and/or Trailer Record), the Plan Sponsor's technical contact will receive a phone call from the ERRP Center.

Submitting Early Retiree Lists

- What a Plan Sponsor needs to know about <u>ERRP Secure Website (SWS) submissions</u>:
  - Early Retiree Lists uploaded to the ERRP SWS must be in a CSV file ("flat file" or "comma delimited file")
  - If a Plan Sponsor wishes to submit an Early Retiree List by uploading a file to the ERRP SWS, it may use the specific file template published by HHS' ERRP Center. Refer to the ERRP Public Website Reference Materials Section, SWS Early Retiree File Template to view this template.
  - If a Plan Sponsor receives an error message while uploading a file, this indicates that the Early Retiree List has been rejected and must be uploaded again. Refer to the ERRP Public Website Reference Materials Section, ERRP SWS Upload Retiree File Error Messages. Use this list to troubleshoot the errors before resubmitting the file.

Reviewing Early Retiree Response Files

Reviewing Response Files

- Each time a Plan Sponsor submits an Early Retiree List, the Plan Sponsor will receive a response (i.e. a Response File) from HHS' ERRP Center with records communicating the periods of time for which each individual is ERRP-eligible, and corresponding reason codes if there is a full or partial denial of an individual's eligibility as an early retiree or early retiree's spouse, surviving spouse, or dependent.

- ERRP Retiree Response Reason Codes are identification numbers that correspond to a specific message about a record in a Response File. Refer to the ERRP Public Website Reference Materials Section, ERRP Early Retiree Response Reason Codes.

Reviewing Response Files

- A Response File will be delivered to the Plan Sponsor in the manner in which the Plan Sponsor selected in the Early Retiree List Setup.

Reviewing Response Files

- The retiree response records contain all the original fields sent by the Plan Sponsor in the early retiree file record layout, plus the response reason code(s). The Plan Sponsor may receive multiple responses (records) for a single early retiree in the event that there is a gap in ERRP eligibility periods.

- The Plan Sponsor may receive up to four reason codes in a response file.

- The ERRP eligibility periods in the retiree response files must be used by Plan Sponsors to accurately identify eligible incurred and paid claims amounts that count towards the cost threshold and that are eligible for reimbursement

Reviewing Response Files

- When a Plan Sponsor receives its early retiree response file, it should review and process the information in the file as soon as possible.

- If the ERRP Center rejects one of the early retirees, please verify that the early retiree's information was entered correctly.

- If incorrect information was entered, please change the information accordingly and resubmit in the next full replacement early retiree list file.

Reviewing Response Files

- If after verifying the early retiree's information, a Plan Sponsor believes the determination made by the ERRP Center is incorrect, please resubmit the early retiree or early retiree's spouse, surviving spouse, or dependent, in the next full replacement file.

- The reason for the rejection could be that the early retiree's information has been updated at the ERRP Center or in the Medicare Beneficiary Database (MBD), causing the determination to be different then what a Plan Sponsor expects.

Reviewing Response Files

- If a Plan Sponsor's early retiree response file indicates that the Plan Sponsor does not have any valid early retirees (or spouses, surviving spouses, or dependents), please verify that the information in the Early Retiree list was entered correctly. In many cases, files with no valid early retirees etc. have an invalid Application ID or a basic formatting problem.

- If incorrect information was entered, please change the information accordingly and resubmit a full Early Retiree List. Check the reason codes associated with the denied records and troubleshoot accordingly.

Reviewing Response Files

- If a Plan Sponsor resubmits a previously rejected early retiree or early retiree's spouse, surviving spouse, or dependent, and receives a second rejection from the ERRP Center, but still believes the decision is incorrect, call the ERRP Center and report the discrepancy.

- The ERRP Center will research the determination(s) as necessary and advise the Plan Sponsor accordingly.

- We recommend that a Plan Sponsor continue to resubmit the rejected early retiree(s) or early retiree's spouse's, surviving spouse's, or dependent's data, as applicable, while the ERRP Center researches the discrepancy, as updated information may result in an agreeable determination.

Reviewing Response Files

- Plan Sponsors should review the Current Covered Early Retiree Counts page in the ERRP SWS. This page displays the following information about the Plan Sponsors' latest early retiree file and the count of early retirees the ERRP Center currently has on record.

    – Application ID

    – Application Plan Year

    – Application Plan Year Unique Early Retiree Count

    – Early Retiree File Last Received Date

    – Response File Last Created Date

    – Plan Year Monthly Early Retiree Count

Note: The Application Unique Early Retiree Count may not match the Monthly Early Retiree Count because a given Early Retiree may not be eligible every month of the Plan Year.

Reviewing Response Files

- It takes the ERRP Center approximately 10 business days to process an early retiree file. If more than 10 days pass without receiving an early retiree response file, contact the ERRP Center for more information.

Managing ERRP Early Retiree Information

Managing ERRP Early Retiree Information

- A Plan Sponsor can submit an Early Retiree List as often as it likes. To ensure that the most accurate Early Retiree List is used for a given reimbursement request, a Plan Sponsor must submit an Early Retiree List as close as possible to when it wishes to submit a request for reimbursement (keeping in mind that it may take up to 10 days for the ERRP Center to process the list and the Plan Sponsor will have to process the ERRP Center's response).

- *Each new Early Retiree List should be a complete replacement of the previous list.*

Managing ERRP Early Retiree Information

- ERRP requires that Plan Sponsors include all applicable Early Retirees and their spouses, surviving spouses and dependent(s), for the specified Plan Year each time an Early Retiree List is submitted. This means that every Early Retiree who reaches the $15K threshold in the Plan Year must be included each time an Early Retiree List is submitted for that Plan Year, even if they were previously submitted.

- In addition, Plan Sponsors will only be reimbursed for Early Retirees and their spouses, surviving spouses and dependent(s) included on the latest Early Retiree List that the ERRP Center has on record.

Managing ERRP Early Retiree Information

- If the Subscriber does not meet the cost threshold but a Member who gets coverage through that Subscriber does, the Subscriber record must be submitted on the Early Retiree List, along with the associated Member record.

- The ERRP Center suggests that Plan Sponsors routinely review the latest Early Retiree Response File, and verify its records against the Current Covered Early Retiree Counts page on the ERRP Secure Website.

Contact Us

Call Toll-Free

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TTY for hearing impaired: 877-575-ERRP (877-575-3777)

 Monday through Friday between 9:00AM - 7:00PM, EST

Send an Email

HHS' ERRP Center email address: help@errp.gov

Visit the Website

http://errp.gov